

SANFORD L. MICHELMAN (SBN 179702)
TODD H. STITT, ESQ. (SBN 179694)
SAMANTHA A. GAVIN, ESQ. (SBN 307233)
MICHELMAN & ROBINSON, LLP
17901 Von Karman Ave., 10th Floor
Irvine, CA 92614-6297
Telephone: 714-557-7990
Facsimile: 714-557-7991

Attorneys for RANJ CO, dba INVISIBLE DEFENDER

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

RANIF CO. dba INVISIBLE
DEFENDER,

Plaintiff.

V.

PHYSICIAN WELLNESS GROUP,
INC., JAREOU HOLDING, LLC,
NUVERUS USA, INC., MICHAEL
JAREOU, FRANCISCO J.
ZANGEROLAME, CURTIS CRUZ,
and DOES 1-100, inclusive.

Defendants.

Case No.: 2:20-CV-01729-TLN-KJN
District Judge: Hon. Troy L. Nunley

**JOINT STIPULATION TO
TRANSFER VENUE TO THE
NORTHERN DISTRICT OF
TEXAS; AND ORDER**

Complaint filed: 7/31/20

1 **IT IS HEREBY STIPULATED AND AGREED TO** by and amongst
2 Plaintiff Ranif Co. dba Invisible Defender (“Plaintiff”) and Defendants Physicians
3 Wellness Group Inc. (“PWG”), Jareou Holding, LLC (“Jareou Holding”), Nuverus
4 USA, Inc. (“Nuverus”), Michael Jareou, Francisco J. Zangerolame, and Curtis Cruz
5 (collectively “Defendants”) (Plaintiff and Defendants collectively referred to as
6 “the Parties”), through their counsel of record, as follows:

7 WHEREAS, Plaintiff filed a Complaint on July 31, 2020 in El Dorado
8 County Superior Court of California;

9 WHEREAS, Defendant Francisco J. Zangerolame filed a notice of removal
10 on August 28, 2020;

11 WHEREAS, all Defendants joined Mr. Zangerolame’s notice of removal;

12 WHEREAS, Plaintiff served all Defendants and Defendants filed responsive
13 pleadings (i.e. Motions to Dismiss based on, among other applicable grounds, lack
14 of personal jurisdiction pursuant to Fed. R. Civ. Proc. Rule 12(b)(2)) on October
15 26, 2020;

16 WHEREAS, Defendants filed a Motion to Transfer Venue on October 27,
17 2020 to transfer this action to the Northern District of Texas;

18 WHEREAS, it is represented that the majority of Defendants reside in Texas;

19 WHEREAS, the Parties have agreed to transfer this action to the United
20 States District Court for the Northern District of Texas, Dallas Division.

21 THEREFORE, the parties stipulate as follows:

22 1. To transfer this case pursuant to 28 U.S.C. section 1404(a), to the
23 United States District Court for the Northern District of Texas, Dallas Division.

24 2. The Clerk of the Eastern District of California is hereby directed to
25 take all steps necessary to effectuate this transfer. Defendants’ Motions to Dismiss
26 shall be taken off calendar without prejudice to filing them again in the Northern
27 District of Texas, Dallas Division. If Defendants file their Motions to Dismiss in

1 the Northern District of Texas, Dallas Division, the Parties are required to meet and
2 confer prior to Defendants filing any responsive pleadings (with the exception of
3 an Answer and/or Counterclaim) in such court.

4

5 **IT IS SO STIPULATED:**

6

7

8 Dated: December 3, 2020

MICHELMAN & ROBINSON, LLP

9

10

By: /s/ Samantha A. Gavin
SANFORD L. MICHELMAN
TODD H. STITT, ESQ.
SAMANTHA A. GAVIN, ESQ.
Attorneys for Ranif Co. dba Invisible
Defender

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

BUCHALTER

By: /s/ Alissa Pleau-Fuller
KEVIN COLLINS, ESQ.
ALISSA PLEAU-FULLER, ESQ.
Attorneys for Defendants

1

ORDER

2

Having considered the foregoing stipulation of the Parties, this Court hereby
3 orders that the action entitled *Ranif Co. v. Physician Wellness Group, Inc., et al.*
4 (Case No. 2:20-cv-01729-TLN-KJN) be transferred for all purposes to the U.S.
5 District Court for the Northern District of Texas, Dallas Division.

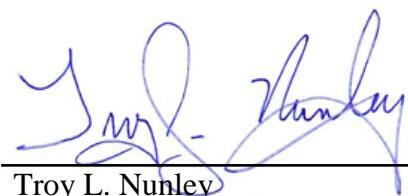
6

7 **IT IS SO ORDERED.**

8

9 Dated: December 3, 2020

10



Troy L. Nunley
United States District Judge

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27